

EFFICACY REVIEW

DATE: IN 6- 8-01 OUT 6-26-01

FILE OR REG. NO. 9688-RIU

PETITION OR EXP. PERMIT NO. \_\_\_\_\_

DATE DIV. RECEIVED May 21, 2001

DATE OF SUBMISSION May 17, 2001

DATE SUBMISSION ACCEPTED \_\_\_\_\_

TYPE PRODUCT(S): (I,)D, H, F, N, R, S \_\_\_\_\_

DATA ACCESSION NO(S). 454124-02;D275460;S598474;Case#070610;AC:165

PRODUCT MGR. NO. 03-Layne/DeLuise

PRODUCT NAME(S) Chemsico Fire Ant Killer PD

COMPANY NAME Chemsico Division of United Industries Corporation

SUBMISSION PURPOSE Provide performance data in support of claims  
for control of fire ant mounds in 3-7 days and  
for initial kill within hours with subject product.

CHEMICAL & FORMULATION Permethrin 0.25%  
(29 lbs./cu.ft. bulk desity ready-to-use dust)

CONCLUSIONS & RECOMMENDATIONS The data presented in EPA Accession  
(MRID) Number 454124-02, having been obtained from a standard field  
test meeting the requirements of § 95-3(c)(1) and (2)(i) on p. 245  
and the standard of § 95-3(c)(3)(i) on p. 245 of the Product..Per-  
formance Guidelines, are adequate to support the label claims for  
starting to work in hours, kills the entire colony in 3 to 7 days  
and no watering in needed, when a formulation identical in concen-  
tration of the active ingredient to the subject product is applied  
to mounds of red imported fire ant, *Solenopsis invicta*, at a rate  
of 1 tablespoon per mound. The claims relative (to be continued)

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to killing the queen, limiting new mound formation and for [control] [eradication] of fire ants ~~not supported by~~ the data submitted since observations were not extended beyond 7 days after application. The Guidelines require observations for control of fire ants by mound application be continued for a minimum of 30 days, and that percent control be based upon the percent reduction in both old and new active mounds in the treatment area as compared to precounts and untreated controls. [§ 95-3(c)(3)(i)] Since the data demonstrate 13.33% reduction in activity within 24 hours, 60% reduction in 48 hours, 86.67% reduction in 3 days and 93.33% reduction in 7 days, as measured by gently probing treated mounds with the surveyor flags which had been used for marking the mounds prior to treatment, the claims for starting to work in hours and killing mounds within 3 to 7 days have been amply demonstrated. We will not ask for further data if the registrant will remove the following claims from the label: ~~"kills the queen"~~ [This requires observations be extended to at least 30 days and that appearance of new mounds in the treated area be sufficiently low that it is not just a movement of treated colonies to a new or nearby location.], "Limits new mound formation" [This requires the same observations as the first claim.], "For [control] [eradication] of fire ants" [This requires the absence of any activity in treated mounds for at least the 30 day observation period following application. Furthermore, the use of terms such as 'eradication' is contrary to 40 CFR 156.10(a)(5)(ii).], "[Fire ant workers will] track the powder deep into the mound, destroying the entire colony including the queen." [This requires observations be extended to at least 30 days and that appearance of new mounds in the treated area be low enough that it is not just a movement of treated colonies to a new or nearby location.] and "...will kill the Queen and entire colony in 3-7 days" [This requires the same observations as previously noted.]

RL Vern L. McFarland, IB

